

Exhibit P

Joshua Harris

From: Jon Chally <jchally@cgc-law.com>
Sent: Monday, September 11, 2023 2:08 PM
To: Julia Stone; Kadie D'Ambrosio; Josh Gunnemann; Rebecca Kolb
Cc: QE-Relay; Michael A. Caplan; Jessica Caleb; Jarred Klorfein; Erin Victoria
Subject: Re: RoadSync/Relay Deposition Dates

[EXTERNAL EMAIL from jchally@cgc-law.com]

Julia,

The 22nd and 25th will work. We are currently triple booked for the 28th, but we'll try to juggle those other depositions and accommodate. We'll let you know tomorrow.

To follow up on our discussion from Friday regarding Relay's motion to strike, we do not believe an evidentiary hearing is required, that Judge Brown suggested he would prefer one, or that one would be appropriate in light of the position we've described (that the first instance in which RoadSync claimed features/functions to be part of its claimed trade secrets was our 6/23 disclosure). Without waiving that position, we've listed below blackout dates in October for those likely to attend such a hearing. Let us know if you intend to ask for a hearing sooner than October or into November (note that we have a week-long jury trial in late October, which complicates scheduling a good bit in this window).

To be clear, we expect to oppose any request for an evidentiary hearing to examine current or former RoadSync lawyers at this point. We're providing these dates to avoid any contention that we are not doing what the Court required. If you intend to request a hearing in these circumstances, please be sure to note our objection in light of the concession we've made (and please be sure to run by us any representation you intend to make regarding our position).

Dates on which RS is unavailable

10/2-10/4

10/10-10/12, 10/13

10/16-10/17, 10/19

10/23-10/27

We are finalizing our response to the discovery statement regarding RoadSync's production. You'll have that this evening as well.

From: Julia Stone <jstone@caplancobb.com>

Date: Monday, September 11, 2023 at 2:27 PM

To: Jon Chally <jchally@cgclaw.com>, Kadie D'Ambrosio <KDAmbrosio@cgclaw.com>, Josh Gunnemann <jgunnemann@cgclaw.com>, Rebecca Kolb <RKolb@cgclaw.com>

Cc: QE-Relay <qe-relay@quinnemanuel.com>, Michael A. Caplan <mcaplan@caplancobb.com>, Jessica Caleb <jcaleb@caplancobb.com>, Jarred Klorfein <jklorfein@caplancobb.com>, Erin Victoria <evictoria@caplancobb.com>

Subject: RoadSync/Relay Deposition Dates

Jon,

I'm writing to follow up on the deposition dates for our clients.

As I mentioned Friday, Ryan Droege is available September 22, and we can do the Relay 30(b)(6) on September 25. We previously discussed having Spencer Barkoff's deposition on September 27, but it looks like September 28 is a better date on our end.

Could you please confirm these dates or let us know if these are an issue by tomorrow morning?

Thanks,

Julia

Julia Blackburn Stone

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